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MAY 11 2011

PUBLIC SERVICE
COMMISSION

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

APPLICATION OF BIG RIVERS
ELECTRIC CORPORATION FOR A
GENERAL ADJUSTMENT IN RATES

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Case No. 2011-00036

Supplemental Responses to the Office of the Attorney General's
Initial Request for Information
dated
April 1, 2011

FILED: May 11, 2011

ORIGINAL

BIG RIVERS ELECTRIC CORPORATION
APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2011-00036

Second Supplemental Response to the Office of the Attorney General's
Initial Request for Information
dated March 30, 2011

May 11, 2011

1 **Item 9)** *Provide the monthly financial and operating reports for every month from*
2 *January 2007 to the present.*

3

4 **Response)** The enclosed CD contains Big Rivers' Monthly Operating Report for each
5 month January 2011 through March 2011.

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7

8 **Witness)** Mark A. Hite

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BIG RIVERS ELECTRIC CORPORATION

**APPLICATION OF BIG RIVERS ELECTRIC CORPORATION
FOR A GENERAL ADJUSTMENT IN RATES
CASE NO. 2011-00036**

**Second Supplemental Response to the Office of the Attorney General's
Initial Request for Information
dated March 30, 2011**

May 11, 2011

1 **Item 28)** *For plant construction projects representing plant additions costing more*
2 *than \$1 million added during 2006 - to date, please state the following:*

- 3
4 *a. Description of project.*
5 *b. Any economic feasibility studies done regarding the project.*
6 *c. Any related cost savings achieved as a result of adding the addition.*
7 *d. Whether the project was for replacement, for new growth, environmental,*
8 *or other.*
9 *e. Description of why the project was necessary.*

10
11 **Response)** The information provided in Big Rivers' response of April 15, 2011 is
12 unchanged. However, since the filing of April 15, 2011, Big Rivers has discovered some
13 archived files in its laser vault files from Western Kentucky Energy Corp. ("WKE") regarding
14 plant construction projects that WKE completed prior to Big Rivers resuming operational
15 control of its generating plants upon the July 17, 2009, closing of the Unwind Transaction.
16 The files do not represent a complete list of WKE's capital projects, and since they are not Big
17 Rivers' projects, they are not relevant to the current proceeding.

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20 **Witnesses)** Robert W. Berry
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May 11, 2011

1 **Item 65)** *With regard to all capital and expense accounts included in the filing, please*
2 *provide:*

3

4 *a. A monthly breakdown of the expense by capital project and/or expense*
5 *account included in the years 2007 to 2010.*

6 *b. A comparison of actual vs. budgeted expenditures in the years 2007 to*
7 *2010.*

8 *c. A detailed explanation of the causes of any increase in expense levels*
9 *from 2005 to 2006; 2006 to 2007; 2007 to 2008; 2008 to 2009; and 2009 to*
10 *2010 and why any and all such increases were necessary and reasonable.*

11 *d. A summary description of each of the capital projects identified and the*
12 *benefit to be derived by ratepayers.*

13 *e. Please provide the costs by project for the years 2007 to 2010.*

14

15 **Response)**

16 a. There is no change to the response previously filed on April 15, 2011.

17 b. There is no change to the response previously filed on April 15, 2011.

18 c. There is no change to the response previously filed on April 15, 2011.

19 d. The information provided in Big Rivers' response of April 15, 2011 is
20 unchanged. However, since the filing of April 15, 2011, Big Rivers has
21 discovered some archived files in its laser vault files from Western
22 Kentucky Energy Corp. ("WKE") regarding plant construction projects that
23 WKE completed prior to Big Rivers resuming operational control of its
24 generating plants upon the July 17, 2009, closing of the Unwind

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1 Transaction. The files do not represent a complete list of WKE's capital
2 projects, and since they are not Big Rivers' projects, they are not relevant to
3 the current proceeding.

4 e. There is no change to the response previously filed on April 15, 2011.

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Witness) Robert W. Berry

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May 11, 2011

1 **Item 122)** *Please provide all weather-related data for all weather stations in the*
2 *Company's possession (whether utilized or not in this case) in electronic format. Please*
3 *provide in Microsoft Excel format if available. If not available in Excel format, please*
4 *provide in ASCII, common delineated or fixed field format with all fields labeled or*
5 *identified. In this response, include all weather stations for which data is available, all*
6 *periods in which data is available, and all weather characteristics available (e.g., HDD,*
7 *CDD, Max Temp, Min Temp, etc.).*

8

9 **Response)** A portion of the weather related data for all weather stations in the Company's
10 possession (utilized or not in this case) was inadvertently omitted from the previously filed CD
11 accompanying this response. A complete set of Big Rivers' weather-related data is provided in
12 electronic format on the enclosed CD.

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14

15 **Witnesses)** John W. Hutts and C. William Blackburn